

independent of an appliance's function that communicates a status report to a remote alarm processor.

Rietkerk teaches a security system wherein sensors 141 are attached to select assets. These sensors 141 communicate a status to an asset protection device (APD) 102, which serves to communicate the security status of the protected assets to a central security station. The Applicant respectfully notes that Rietkerk's security system is separate and distinct from the appliances/assets that are being protected.

The Applicant respectfully suggests that the Examiner is using impermissible hindsight reconstruction to arrive at the Applicant's invention from Bassett and Rietkerk. Conventionally, appliances deal with appliance matters, and security systems deal with security matters. Bassett addresses home automation, yet still conforms to this conventional concept of a separate and distinct security system. Rietkerk addresses a technique for protecting assets, yet does not suggest that the assets themselves be responsible for reporting their security status. Neither Bassett nor Rietkerk teach or suggest distributing security functions among appliances on a network.

The Applicant recognized the benefits that could be achieved via an integration of a security function within appliances on an automation network. Recognizing that future appliances will be configured to facilitate home automation functions, the Applicant also recognized that the addition of a security function to these home automation functions would increase the utility of the home automation network, at a minimal additional cost. Additionally, by distributing the security function among appliances on a network, the vulnerability of the security system to a single point of failure is substantially reduced. Neither Bassett nor Rietkerk teaches or suggests such an integration and function distribution, even though they each provide a substantial analysis of the requirements and desired capabilities of each of their respective systems. Bassett's integration of a security system into a home automation system is to merely configure a conventional security system to operate on the home automation network. Rietkerk presents a stand-alone security system, and does not address integrating and distributing security functions among appliances.

Because neither Bassett nor Rietkerk, individually or collectively, teach or suggest a network wherein appliances include status reporters that are independent of the

appliance function, as specifically claimed in each of the Applicant's independent claims 17 and 26, upon which claims 17-20 and 25-28 depend, the Applicant respectfully requests the Examiner's reconsideration of the rejection of claims 17-20 and 25-28 under 35 U.S.C. 103(a) as being unpatentable over Bassett in view of Rietkerk.

With regard to claim 29, upon which claims 30-33 depend, and in further regard to claim 18, upon which claims 19-23 depend, the Applicant teaches and specifically claims the incorporation of the alarm processor into an appliance whose primary function is not security. For example, the alarm processor may be included in a television. Both Bassett and Rietkerk teach the alarm processing being contained in a conventional security system. As noted above, by distributing the various components of a security system among appliances, the robustness of the security system is substantially enhanced, and the vulnerability to a single-point failure is substantially reduced.

The Examiner asserts that Rietkerk teaches a second appliance 107 that includes the alarm processor. The Applicant acknowledges that Rietkerk uses reference symbol 107 to correspond to appliances, but the Applicant respectfully traverses the Examiner's assertion that these appliances 107 effect an alarm processing function. Rietkerk's alarm sensing module 132 and tamper sensing module 131 effect the alarm processing function. These components are contained in the asset protection device (APD) 102, which is a security device that is separate and distinct from the appliances 107.

Because neither Bassett nor Rietkerk, individually or collectively, teach or suggest a non-security appliance that contains an alarm processor, as specifically claimed in claims 18 and 29, the Applicant respectfully requests the Examiner's reconsideration of the rejection of claims 18-20 and 29-31 and 33 under 35 U.S.C. 103(a) as being unpatentable over Bassett in view of Rietkerk.

The Examiner has rejected claims 21-23 under 35 U.S.C. 103(a) as being unpatentable over Bassett in view of Rietkerk as applied to claim 17 above, and further in view of Hall et al (USP 5,898,831, hereinafter Hall). The Applicant respectfully traverses this rejection based on the remarks above with regard to claim 17, and further based on the remarks above with regard to claims 18, upon which these rejected claims depend.

Claims 21-23 include a further distribution of security functions to a third appliance, wherein the third appliance also includes an alarm processor. Via such a distribution of functions, the reliability of the system is substantially increased, by not relying on the availability of the alarm processor in the second appliance alone.

Because neither Bassett nor Rietkerk, individually or collectively, teach or suggest a network wherein appliances include status reporters that are independent of the appliance function, as specifically claimed in claim 17, and because neither Bassett nor Rietkerk, individually or collectively, teach or suggest a non-security appliance that contains an alarm processor, as specifically claimed in claim 18, upon which claims 21-23 depend, the Applicant respectfully requests the Examiner's reconsideration of the rejection of claims 21-23 under 35 U.S.C. 103(a) as being unpatentable over Bassett in view of Rietkerk as applied to claim 17 above, and further in view of Hall.

Respectfully submitted,



Robert M. McDermott, Esq.  
Reg. No. 41,508  
804-493-0707

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